

Congress of the United States

Washington, DC 20515

December 7, 2022

Horacio D. Rozanski
President and Chief Executive Officer
Booz Allen Hamilton
8283 Greensboro Drive
McLean, VA 22102

Dear Mr. Rozanski:

I write to request information about Booz Allen Hamilton's work for and on behalf of foreign governments. A *Washington Post* investigation released last month revealed that since 2015, "more than 500 retired U.S. military personal – including scores of generals and admirals" have taken jobs with foreign governments – "mostly in countries known for human rights abuses and political repression."¹ This was an alarming finding, raising questions about whether these former U.S. military officials and the firms that hire them are working in the best interests of the United States government and its citizens, or in the interests of some of the world's worst regimes. Given these concerns, I ask that you provide information regarding the employees of your firm that have worked on behalf of foreign governments, particularly those with a history of repression and human rights abuses, and how your firm ensures its officials are not involved in illegal or inappropriate activities that harm U.S. national security interests.

The investigation by *The Washington Post* and the Project On Government Oversight found that between April 2010 and August 2020, "the State Department issued over 500 waivers to retiring servicemembers, allowing them to take emoluments to work on behalf of foreign interests."² The trend of American servicemembers taking "lucrative" roles with foreign governments has accelerated over the past decade, as foreign governments work to leverage American expertise and "political clout."³

Alarming, many of the countries hiring former U.S. servicemembers have committed appalling human rights abuses,⁴ and these relationships may undermine a key plank of U.S. foreign policy that places restrictions on assistance to foreign governments accused of human rights violations.⁵

¹ Washington Post, "Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince," Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

² Project on Government Oversight, "State Dept Is Quietly Approving Former Servicemembers' Work for Foreign Interests. That's a Problem." Julianne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template.

³ Washington Post, "Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince," Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

⁴ *Id.*

⁵ Congressional Research Service, "Global Human Rights: Security Forces Vetting ("Leahy Laws")," Michael A. Weber, August 5, 2022, <https://www.crs.gov/Reports/IF10575>.

However, by funneling U.S. expertise through ‘consulting’ firms that collect six- and seven-figure paychecks,⁶ foreign governments have been able to build up their military forces with U.S. assistance and without ongoing oversight from the U.S. government. Former Army colonel William Mooney, in his role at the small firm Fairfax National Security Solutions LLC, brought in a \$480,000 annual salary consulting for the governments of the United Arab Emirates and Saudi Arabia.⁷ Over the past seven years, 280 former U.S. servicemembers – included retired Marine Corps General and former Defense Secretary James Mattis,⁸ who is now a senior counselor at the Cohen Group⁹ - have sought authorization to work the United Arab Emirates, which has faced allegations of human rights abuses in Yemen and Libya.¹⁰

Additionally, since 2016, 15 retired U.S. generals and admirals have taken positions as paid consultants for the Defense Ministry of Saudi Arabia.¹¹ IronNet Cybersecurity, run by former National Security Agency Director Keith Alexander, worked with Saud al-Qahtani, a senior aide to crown prince Mohammed bin Salman, from July 2018 until 2020, despite Qatani’s involvement in the 2018 extrajudicial execution of journalist Jamal Khashoggi.¹² Jones Group International and its subsidiary Ironhand Security, led by former national security adviser and retired Marine General James Jones, expanded its partnership with the Saudi Defense ministry despite claims by General Jones that he was “disturbed” and “horrified” by Khashoggi’s death at the hands of the Saudi government.¹³ Major consulting firms, like yours, hire “dozens of American veterans” to work in Saudi Arabia, advising both the Saudi army and the Saudi Navy while the country maintained a blockade against Yemen, that has “threatened millions with starvation.”¹⁴

⁶ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

⁷ Washington Post, “UAE RELIED ON EXPERTISE OF RETIRED U.S. TROOPS TO BEEF UP ITS MILITARY,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>.

⁸ Washington Post, “UAE RELIED ON EXPERTISE OF RETIRED U.S. TROOPS TO BEEF UP ITS MILITARY,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>.

⁹ The Cohen Group, “James Mattis, Senior Counselor,” <https://cohengroup.net/who-we-are/team/james-mattis>.

¹⁰ Associated Press, “Inside Yemen’s secret prisons: ‘We could hear the screams,’” Maggie Michael, June 22, 2017, https://apnews.com/article/terrorism-counterterrorism-ap-top-news-al-qaida-international-news-b2a5ecfd1adb442a86df5bd05bc6599e?itid=lk_inline_enhanced-template; U.S. Department of State, “2020 Country Reports on Human Rights Practices: United Arab Emirates,” <https://www.state.gov/wp-content/uploads/2021/10/UNITED-ARAB-EMIRATES-2020-HUMAN-RIGHTS-REPORT.pdf>.

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¹⁴ New York Times, “Consulting Firms Keep Lucrative Saudi Alliance, Shaping Crown Prince’s Vision,” Michael Forsythe, Mark Mazzetti, Ben Hubbard, and Walt Bogdanich, November 4, 2018, <https://www.nytimes.com/2018/11/04/world/middleeast/mckinsey-bcg-booz-allen-saudi-khashoggi.html>.

These arrangements benefit foreign governments by providing them with soft power and influence in Washington. Many high-ranking former generals, admirals, and other servicemembers have boosted the interests of these foreign governments without disclosing their financial ties. According to the Project On Government Oversight, retired General Charles “Chuck” Wald, who worked as a consultant for both Jones Group International and Ironhand Security, LLC,¹⁵ published op-eds in *Politico*, *The Hill*, and *The Wall Street Journal* advocating for support of Saudi Arabia without disclosing that relationship.¹⁶ One op-ed called for the U.S. to “articulate explicit military backing for Saudi Arabia and U.A.E.”¹⁷

The emoluments clause of the constitution requires retired military officers to receive congressional approval before accepting compensation from any foreign government.¹⁸ This is one of our country’s founding anti-corruption provisions to “limit foreign influence on federal officers.”¹⁹ Your firm employed “dozens of American military veterans” in Saudi Arabia subject to this clause, including retired Navy Rear Admiral Steven G. Smith.²⁰

This is not the first time I have raised concerns about lobbying and consulting firms with ties to repressive foreign countries. Following the Saudi regime’s ghastly assassination of journalist Jamal Khashoggi, I requested information from 23 firms that had lobbied for Saudi Arabia.²¹ I’ve also previously questioned your firm, Boston Consulting Group, and Deloitte about the services it has provided to the Kingdom of Saudi Arabia.²² Finally, I also sought information from McKinsey about its reported activities to support Saudi efforts to suppress the regime’s critics, which may have led to one critic’s arrest, the imprisonment of two family members of another critic, and shutting down the Twitter account of a third.²³

¹⁵ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

¹⁶ Project on Government Oversight, “State Dept Is Quietly Approving Former Servicemembers’ Work for Foreign Interests. That’s a Problem.” Julienne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template.

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¹⁸ U.S. Constitution, art. I, § 9, cl. 8.

¹⁹ Congressional Research Service, “The Emoluments Clause of the Constitution,” January 27, 2021, <https://crsreports.congress.gov/product/pdf/IF/IF11086>.

²⁰ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>; New York Times, “Consulting Firms Keep Lucrative Saudi Alliance, Shaping Crown Prince’s Vision,” Michael Forsythe, Mark Mazzetti, Ben Hubbard, and Walt Bogdanich, November 4, 2018, <https://www.nytimes.com/2018/11/04/world/middleeast/mckinsey-bcg-booz-allen-saudi-khashoggi.html>.

²¹ Senator Elizabeth Warren, “Warren Seeks Answers from Lobbying Firms about Services for Saudi Government,” November 29, 2018, <https://www.warren.senate.gov/oversight/letters/warren-seeks-answers-from-lobbying-firms-about-services-for-saudi-government>.

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²³ Letter from Senator Warren to Kevin Sneader at McKinsey, October 28, 2018, <https://www.warren.senate.gov/imo/media/doc/2018.10.23%20Letter%20to%20McKinsey%20re%20Saudi%20Arabia.pdf>; New York Times, “Saudis’ Image Makers: A Troll Army and a Twitter Insider,” Katie Benner, Mark Mazzetti, Ben Hubbard, and Mike Isaac, October 20, 2018,

It is patently clear that more stringent rules are needed to protect the nation's national security from the pervasive influence-peddling of foreign governments. My *Anti-Corruption and Public Integrity Act* would end most foreign lobbying.²⁴ My *Department of Defense Ethics and Anti-Corruption Act* would also require former senior officials who had been employed in the White House, the Department of State; the Department of Defense, and the Department of the Treasury to receive approval from the Secretary of State before advising foreign governments.²⁵

The American people assume former government officials and retired military officers will not work against the national security interests of the United States. Your firm's affiliation with these regimes raises major questions about whether this assumption is incorrect and whether Booz Allen Hamilton's business activities were consistent with America's national security interests. Although your firm announced an end to its Middle East business earlier this year,²⁶ you should provide a full and transparent accounting of your firm's ties to foreign government governments while operating in this region. I request answers to the following questions and requests for information no later than December 21, 2022:

1. Does Booz Allen Hamilton currently have any business relationships with foreign governments or entities affiliated with foreign governments?
 - a. If so, which countries or entities affiliated with foreign governments are current Booz Allen Hamilton clients?
 - b. For each of the last five years, please provide a list countries or entities affiliated with foreign governments that were Booz Allen Hamilton clients
2. For each entity listed in response to question #1, please provide a summary of the work done for these clients, and the total amount paid to the Booz Allen Hamilton or individuals affiliated with Booz Allen Hamilton by these clients.
3. Have any Booz Allen Hamilton employees received advisory opinions from federal government agencies on whether their work requires registration under the Foreign Agents Registration Act, an emoluments waiver, or is subject to International Traffic in Arms controls? Please provide those advisory opinions.
4. Please provide a list of each former U.S. servicemember that has worked for Booz Allen Hamilton on behalf of foreign governments, including information on the foreign government they worked for, the time period in which they worked, and the amount they received in compensation for this work.
5. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time since 2017 to the present, for services that your firm provides directly to, or for the benefit of,

<https://www.nytimes.com/2018/10/20/us/politics/saudi-imagecampaign-twitter.html>.

²⁴ *Anti-Corruption and Public Integrity Act*, (115th Congress) S. 3357, Section 205.


²⁵ *Department of Defense Ethics and Public Integrity Act*, S. 2396, Section 201.

²⁶ Booz Allen Hamilton, "Combined team will deliver excellent results for clients," press release, September 1, 2022, <https://www.boozallen.com/menu/media-center/q2-2023/oliver-wyman-completes-acquisition-of-mena-consulting.html>.


foreign governments or any entities affiliated with foreign governments. These documents should include:

- a. the total compensation received for services rendered, and
- b. specific issues on which the firm engaged in activities, including lobbying (as defined in Section 3 of the Lobbying Disclosure Act of 1995)²⁷ and public relations, including, to the maximum extent practicable, any specific rule, regulation, executive order, contract, or any other program, policy, or position.

Sincerely,



Elizabeth Warren
United States Senator



Sara Jacobs
Member of Congress

²⁷ 2 U.S.C. 1602(7)

Congress of the United States

Washington, DC 20515

December 7, 2022

James Miller
Chief Executive Officer
Fairfax National Security Solutions, LLC
3701 North Harrison Street, Mason
Arlington, VA 22207

Dear Mr. Miller:

I write to request information about Fairfax National Security Solution’s work for and on behalf of foreign governments. A *Washington Post* investigation released last month revealed that since 2015, “more than 500 retired U.S. military personal – including scores of generals and admirals” have taken jobs with foreign governments – “mostly in countries known for human rights abuses and political repression.”¹ This was an alarming finding, raising questions about whether these former U.S. military officials and the firms that hire them are working in the best interests of the United States government and its citizens, or in the interests of some of the world’s worst regimes. Given these concerns, I ask that you provide information regarding the employees of your firm that have worked on behalf of foreign governments, particularly those with a history of repression and human rights abuses, and how your firm ensures its officials are not involved in illegal or inappropriate activities that harm U.S. national security interests.

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Alarming, many of the countries hiring former U.S. servicemembers have committed appalling human rights abuses,⁴ and these relationships may undermine a key plank of U.S. foreign policy

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that places restrictions on assistance to foreign governments accused of human rights violations.⁵ However, by funneling U.S. expertise through ‘consulting’ firms that collect six- and seven-figure paychecks,⁶ foreign governments have been able to build up their military forces with U.S. assistance and without ongoing oversight from the U.S. government. Over the past seven years, 280 former U.S. servicemembers - included retired Marine Corps General and former Defense Secretary James Mattis,⁷ who is now a senior counselor at the Cohen Group⁸ - have sought authorization to work the United Arab Emirates, which has faced allegations of human rights abuses in Yemen and Libya.⁹

Additionally, since 2016, 15 retired U.S. generals and admirals have taken positions as paid consultants for the Defense Ministry of Saudi Arabia.¹⁰ IronNet Cybersecurity, run by former National Security Agency Director Keith Alexander, worked with Saud al-Qahtani, a senior aide to crown prince Mohammed bin Salman, from July 2018 until 2020, despite Qatani’s involvement in the 2018 extrajudicial execution of journalist Jamal Khashoggi.¹¹ Jones Group International and its subsidiary Ironhand Security, led by former national security adviser and retired Marine General James Jones, expanded its partnership with the Saudi Defense ministry despite claims by General Jones that he was “disturbed” and “horrified” by Khashoggi’s death at the hands of the Saudi government.¹² Major consulting firms, like Booz Allen Hamilton, hire “dozens of American veterans” to work in Saudi Arabia, advising both the Saudi army and the Saudi Navy while the country maintained a blockade against Yemen that has “threatened millions with starvation.”¹³

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⁸ The Cohen Group, “James Mattis, Senior Counselor,” <https://cohengroup.net/who-we-are/team/james-mattis>.

⁹ Associated Press, “Inside Yemen’s secret prisons: ‘We could hear the screams,’” Maggie Michael, June 22, 2017, https://apnews.com/article/terrorism-counterterrorism-ap-top-news-al-qaida-international-news-b2a5ecfd1adb442a86df5bd05bc6599e?itid=lk_inline_enhanced-template; U.S. Department of State, “2020 Country Reports on Human Rights Practices: United Arab Emirates,” <https://www.state.gov/wp-content/uploads/2021/10/UNITED-ARAB-EMIRATES-2020-HUMAN-RIGHTS-REPORT.pdf>.

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These arrangements benefit foreign governments by providing them with soft power and influence in Washington. Many high-ranking former Generals, Admirals, and other servicemembers have boosted the interests of these foreign governments without disclosing their financial ties. According to the Project On Government Oversight, retired General Charles “Chuck” Wald, who worked as a consultant for both Jones Group International and Ironhand Security, LLC,¹⁴ published op-eds in *Politico*, *The Hill*, and *The Wall Street Journal* advocating for support of Saudi Arabia without disclosing that relationship.¹⁵ One op-ed called for the U.S. to “articulate explicit military backing for Saudi Arabia and U.A.E.”¹⁶

The emoluments clause of the constitution requires retired military officers to receive congressional approval before accepting compensation from any foreign government.¹⁷ This is one of our country’s founding anti-corruption provisions to “limit foreign influence on federal officers.”¹⁸ At your firm, former Army colonel William Mooney brought in a \$480,000 annual salary consulting for the governments of the United Arab Emirates and Saudi Arabia, both known human rights abusers.¹⁹

This is not the first time I have raised concerns about lobbying and consulting firms with ties to repressive foreign countries. Following the Saudi regime’s ghastly assassination of journalist Jamal Khashoggi, I requested information from 23 firms that had lobbied for Saudi Arabia.²⁰ I’ve also questioned Booz Allen Hamilton, Boston Consulting Group, and Deloitte about the services it has provided to the Kingdom of Saudi Arabia.²¹ Finally, I also sought information from McKinsey about its reported activities to support Saudi efforts to suppress the regime’s critics, which may have led to one critic’s arrest, the imprisonment of two family members of another critic, and shutting down the Twitter account of a third.²²

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It is patently clear that more stringent rules are needed to protect the nation's national security from the pervasive influence-peddling of foreign governments. My *Anti-Corruption and Public Integrity Act* would end most foreign lobbying.²³ My *Department of Defense Ethics and Anti-Corruption Act* would also require former senior officials who had been employed in the White House, the Department of State; the Department of Defense, and the Department of the Treasury to receive approval from the Secretary of State before advising foreign governments.²⁴

The American people assume former government officials and retired military officers will not work against the national security interests of the United States. Your firm's affiliation with these regimes raises major questions about whether this assumption is incorrect and whether Fairfax National Security Solution's business activities are consistent with America's national security interests. In order to have a full and transparent accounting of your firm's ties to foreign government governments, I request answers to the following questions and requests for information no later than December 21, 2022:

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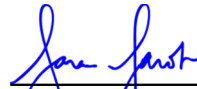
²⁴ *Department of Defense Ethics and Public Integrity Act*, S. 2396, Section 201.

5. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time since 2017 to the present, for services that your firm provides directly to, or for the benefit of, foreign governments or any entities affiliated with foreign governments. These documents should include:
- a. the total compensation received for services rendered, and
 - b. specific issues on which the firm engaged in activities, including lobbying (as defined in Section 3 of the Lobbying Disclosure Act of 1995)²⁵ and public relations, including, to the maximum extent practicable, any specific rule, regulation, executive order, contract, or any other program, policy, or position.

Sincerely,



Elizabeth Warren
United States Senator



Sara Jacobs
Member of Congress

²⁵ 2 U.S.C. 1602(7)

Congress of the United States

Washington, DC 20515

December 7, 2022

Keith Alexander
Chairman and Chief Executive Officer
IronNet Cybersecurity
7900 Tysons One Place
Suite 400
McLean, Virginia 22102

Dear Mr. Alexander:

I write to request information about IronNet Cybersecurity's work for and on behalf of foreign governments. A *Washington Post* investigation released last month revealed that since 2015, "more than 500 retired U.S. military personal – including scores of generals and admirals" have taken jobs with foreign governments – "mostly in countries known for human rights abuses and political repression."¹ This was an alarming finding, raising questions about whether these former U.S. military officials and the firms that hire them are working in the best interests of the United States government and its citizens, or in the interests of some of the world's worst regimes. Given these concerns, I ask that you provide information regarding the employees of your firm that have worked on behalf of foreign governments, particularly those with a history of repression and human rights abuses, and how your firm ensures its officials are not involved in illegal or inappropriate activities that harm U.S. national security interests.

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Alarming, many of the countries hiring former U.S. servicemembers have committed appalling human rights abuses,⁴ and these relationships may undermine a key plank of U.S. foreign policy

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² Project on Government Oversight, "State Dept Is Quietly Approving Former Servicemembers' Work for Foreign Interests. That's a Problem." Julianne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template.

³ Washington Post, "Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince," Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

⁴ *Id.*

that places restrictions on assistance to foreign governments accused of human rights violations.⁵ However, by funneling U.S. expertise through ‘consulting’ firms that collect six- and seven-figure paychecks,⁶ foreign governments have been able to build up their military forces with U.S. assistance and without ongoing oversight from the U.S. government. Former Army colonel William Mooney, in his role at the small firm Fairfax National Security Solutions LLC, brought in a \$480,000 annual salary consulting for the governments of the United Arab Emirates and Saudi Arabia.⁷ Over the past seven years, 280 former U.S. servicemembers - included retired Marine Corps General and former Defense Secretary James Mattis,⁸ who is now a senior counselor at the Cohen Group⁹ - have sought authorization to work the United Arab Emirates, which has faced allegations of human rights abuses in Yemen and Libya.¹⁰

Additionally, since 2016, 15 retired U.S. generals and admirals have taken positions as paid consultants for the Defense Ministry of Saudi Arabia.¹¹ Your firm, IronNet Cybersecurity worked with Saud al-Qahtani, a senior aide to crown prince Mohammed bin Salman, from July 2018 until 2020, despite Qatani’s involvement in the 2018 extrajudicial execution of journalist Jamal Khashoggi.¹² Jones Group International and its subsidiary Ironhand Security, led by former national security adviser and retired Marine General James Jones, expanded its partnership with the Saudi Defense ministry despite claims by General Jones that he was “disturbed” and “horrified” by Khashoggi’s death at the hands of the Saudi government.¹³ Major consulting firms, like Booz Allen Hamilton, hire “dozens of American veterans” to work in Saudi Arabia, advising both the Saudi army and the Saudi Navy while the country maintained a blockade against Yemen that has “threatened millions with starvation.”¹⁴

⁵ Congressional Research Service, “Global Human Rights: Security Forces Vetting (“Leahy Laws”),” Michael A. Weber, August 5, 2022, <https://www.crs.gov/Reports/IF10575>.

⁶ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

⁷ Washington Post, “UAE RELIED ON EXPERTISE OF RETIRED U.S. TROOPS TO BEEF UP ITS MILITARY,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>.

⁸ Washington Post, “UAE RELIED ON EXPERTISE OF RETIRED U.S. TROOPS TO BEEF UP ITS MILITARY,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>.

⁹ The Cohen Group, “James Mattis, Senior Counselor,” <https://cohengroup.net/who-we-are/team/james-mattis>.

¹⁰ Associated Press, “Inside Yemen’s secret prisons: ‘We could hear the screams,’” Maggie Michael, June 22, 2017, https://apnews.com/article/terrorism-counterterrorism-ap-top-news-al-qaida-international-news-b2a5ecfd1adb442a86df5bd05bc6599e?itid=lk_inline_enhanced-template; U.S. Department of State, “2020 Country Reports on Human Rights Practices: United Arab Emirates,” <https://www.state.gov/wp-content/uploads/2021/10/UNITED-ARAB-EMIRATES-2020-HUMAN-RIGHTS-REPORT.pdf>.

¹¹ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

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¹⁴ New York Times, “Consulting Firms Keep Lucrative Saudi Alliance, Shaping Crown Prince’s Vision,” Michael Forsythe, Mark Mazzetti, Ben Hubbard, and Walt Bogdanich, November 4, 2018,

These arrangements benefit foreign governments by providing them with soft power and influence in Washington. Many high-ranking former Generals, Admirals, and other servicemembers have boosted the interests of these foreign governments without disclosing their financial ties. According to the Project On Government Oversight, retired General Charles “Chuck” Wald, who worked as a consultant for both Jones Group International and Ironhand Security, LLC,¹⁵ published op-eds in *Politico*, *The Hill*, and *The Wall Street Journal* advocating for support of Saudi Arabia without disclosing that relationship.¹⁶ One op-ed called for the U.S. to “articulate explicit military backing for Saudi Arabia and U.A.E.”¹⁷

The emoluments clause of the constitution requires retired military officers to receive congressional approval before accepting compensation from any foreign government.¹⁸ This is one of our country’s founding anti-corruption provisions to “limit foreign influence on federal officers.”¹⁹ As former National Security Agency Director and Commander of U.S. Cyber Command, you are subject to this clause, and your firm should similarly be working in the interests of American national security.

This is not the first time I have raised concerns about lobbying and consulting firms with ties to repressive foreign countries. Following the Saudi regime’s ghastly assassination of journalist Jamal Khashoggi, I requested information from 23 firms that had lobbied for Saudi Arabia.²⁰ I’ve also questioned Booz Allen Hamilton, Boston Consulting Group, and Deloitte about the services it has provided to the Kingdom of Saudi Arabia.²¹ Finally, I also sought information from McKinsey about its reported activities to support Saudi efforts to suppress the regime’s critics, which may have led to one critic’s arrest, the imprisonment of two family members of another critic, and shutting down the Twitter account of a third.²²

<https://www.nytimes.com/2018/11/04/world/middleeast/mckinsey-bcg-booz-allen-saudi-khashoggi.html>.

¹⁵ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

¹⁶ Project on Government Oversight, “State Dept Is Quietly Approving Former Servicemembers’ Work for Foreign Interests. That’s a Problem.” Julienne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template.

¹⁷ The Hill, “A comprehensive strategy that secures real and lasting changes in Iran’s behavior,” Eric Edelman and Charles Wald, September 19, 2018, <https://thehill.com/blogs/congress-blog/foreign-policy/407392-a-comprehensive-strategy-that-secures-real-and-lasting/>.

¹⁸ U.S. Constitution, art. I, § 9, cl. 8.

¹⁹ Congressional Research Service, “The Emoluments Clause of the Constitution,” January 27, 2021, <https://crsreports.congress.gov/product/pdf/IF/IF11086>.

²⁰ Senator Elizabeth Warren, “Warren Seeks Answers from Lobbying Firms about Services for Saudi Government,” November 29, 2018, <https://www.warren.senate.gov/oversight/letters/warren-seeks-answers-from-lobbying-firms-about-services-for-saudi-government>.

²¹ Senator Elizabeth Warren, “Warren Seeks Answers from Major Consulting Firms about Services for Saudi Government,” November 15, 2018, <https://www.warren.senate.gov/oversight/letters/warren-seeks-answers-from-major-consulting-firms-about-services-for-saudi-government>.

²² Letter from Senator Warren to Kevin Sneader at McKinsey, October 28, 2018, <https://www.warren.senate.gov/imo/media/doc/2018.10.23%20Letter%20to%20McKinsey%20re%20Saudi%20Arabia.pdf>; New York Times, “Saudis’ Image Makers: A Troll Army and a Twitter Insider,” Katie Benner, Mark Mazzetti, Ben Hubbard, and Mike Isaac, October 20, 2018, <https://www.nytimes.com/2018/10/20/us/politics/saudi-imagecampaign-twitter.html>.

It is patently clear that more stringent rules are needed to protect the nation's national security from the pervasive influence-peddling of foreign governments. My *Anti-Corruption and Public Integrity Act* would end most foreign lobbying.²³ My *Department of Defense Ethics and Anti-Corruption Act* would also require former senior officials who had been employed in the White House, the Department of State; the Department of Defense, and the Department of the Treasury to receive approval from the Secretary of State before advising foreign governments.²⁴

The American people assume former government officials and retired military officers will not work against the national security interests of the United States. Your firm's affiliation with these regimes raises major questions about whether this assumption is incorrect and whether IronNet Cybersecurity's business activities are consistent with America's national security interests. In order to have a full and transparent accounting of your firm's ties to foreign government governments, I request answers to the following questions and requests for information no later than December 21, 2022:


1. Does IronNet Cybersecurity currently have any business relationships with foreign governments or entities affiliated with foreign governments?
 - a. If so, which countries or entities affiliated with foreign governments are current IronNet Cybersecurity clients?
 - b. For each of the last five years, please provide a list countries or entities affiliated with foreign governments that were IronNet Cybersecurity clients
2. For each entity listed in response to question #1, please provide a summary of the work done for these clients, and the total amount paid to IronNet Cybersecurity or individuals affiliated with IronNet Cybersecurity by these clients.
3. Have any employees of Ironnet Cybersecurity received advisory opinions from federal government agencies on whether their work requires registration under the Foreign Agents Registration Act, an emoluments waiver, or is subject to International Traffic in Arms controls? Please provide those advisory opinions.
4. Please provide a list of each former U.S. servicemember that has worked for IronNet Cybersecurity on behalf of foreign governments, including information on the foreign government they worked for, the time period in which they worked, and the amount they received in compensation for this work.
5. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time since 2017 to the present, for services that your firm provides directly to, or for the benefit of, foreign governments or any entities affiliated with foreign governments. These documents should include:
 - a. the total compensation received for services rendered, and

²³ *Anti-Corruption and Public Integrity Act*, (115th Congress) S. 3357, Section 205.

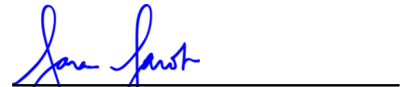
²⁴ *Department of Defense Ethics and Public Integrity Act*, S. 2396, Section 201.

- b. specific issues on which the firm engaged in activities, including lobbying (as defined in Section 3 of the Lobbying Disclosure Act of 1995)²⁵ and public relations, including, to the maximum extent practicable, any specific rule, regulation, executive order, contract, or any other program, policy, or position.

Sincerely,



Elizabeth Warren
United States Senator



Sara Jacobs
Member of Congress

²⁵ 2 U.S.C. 1602(7)

Congress of the United States

Washington, DC 20515

December 7, 2022

General James L. Jones
President
Jones Group International & Ironhand Security, LLC
8000 Towers Crescent Drive, Suite 1525
Vienna, VA 22182

Dear Mr. Jones:

I write to request information about Jones Group International and Ironhand Security, LLC's work for and on behalf of foreign governments. A *Washington Post* investigation released last month revealed that since 2015, "more than 500 retired U.S. military personal – including scores of generals and admirals" have taken jobs with foreign governments – "mostly in countries known for human rights abuses and political repression."¹ This was an alarming finding, raising questions about whether these former U.S. military officials and the firms that hire them are working in the best interests of the United States government and its citizens, or in the interests of some of the world's worst regimes. Given these concerns, I ask that you provide information regarding the employees of your firm that have worked on behalf of foreign governments, particularly those with a history of repression and human rights abuses, and how your firm ensures its officials are not involved in illegal or inappropriate activities that harm U.S. national security interests.

The investigation by *The Washington Post* and the Project on Government Oversight found that between April 2010 and August 2020, "the State Department issued over 500 waivers to retiring servicemembers, allowing them to take emoluments to work on behalf of foreign interests."² The trend of American servicemembers taking "lucrative" roles with foreign governments has accelerated over the past decade, as foreign governments work to leverage American expertise and "political clout."³

Alarming, many of the countries hiring former U.S. servicemembers have committed appalling human rights abuses,⁴ and these relationships may undermine a key plank of U.S. foreign policy

¹ Washington Post, "Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince," Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

² Project on Government Oversight, "State Dept Is Quietly Approving Former Servicemembers' Work for Foreign Interests. That's a Problem." Julianne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template.

³ Washington Post, "Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince," Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

⁴ *Id.*

that places restrictions on assistance to foreign governments accused of human rights violations.⁵ However, by funneling U.S. expertise through ‘consulting’ firms that collect six- and seven-figure paychecks,⁶ foreign governments have been able to build up their military forces with U.S. assistance and without ongoing oversight from the U.S. government. Former Army colonel William Mooney, in his role at the small firm Fairfax National Security Solutions LLC, brought in a \$480,000 annual salary consulting for the governments of the United Arab Emirates and Saudi Arabia.⁷ Over the past seven years, 280 former U.S. servicemembers - included retired Marine Corps General and former Defense Secretary James Mattis,⁸ who is now a senior counselor at the Cohen Group⁹ - have sought authorization to work the United Arab Emirates, which has faced allegations of human rights abuses in Yemen and Libya.¹⁰

Additionally, since 2016, 15 retired U.S. generals and admirals have taken positions as paid consultants for the Defense Ministry of Saudi Arabia.¹¹ IronNet Cybersecurity, run by former National Security Agency Director Keith Alexander, worked with Saud al-Qahtani, a senior aide to crown prince Mohammed bin Salman, from July 2018 until 2020, despite Qatani’s involvement in the 2018 extrajudicial execution of journalist Jamal Khashoggi.¹² Under your leadership, Jones Group International and its subsidiary Ironhand Security expanded its partnership with the Saudi Defense ministry despite claims by General Jones that he was “disturbed” and “horrified” by Khashoggi’s death at the hands of the Saudi government.¹³ Major consulting firms, like Booz Allen Hamilton, hire “dozens of American veterans” to work in Saudi Arabia, advising both the Saudi army and the Saudi Navy while the country maintained a blockade against Yemen, that has “threatened millions with starvation.”¹⁴

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⁹ The Cohen Group, “James Mattis, Senior Counselor,” <https://cohengroup.net/who-we-are/team/james-mattis>.

¹⁰ Associated Press, “Inside Yemen’s secret prisons: ‘We could hear the screams,’” Maggie Michael, June 22, 2017, https://apnews.com/article/terrorism-counterterrorism-ap-top-news-al-qaida-international-news-b2a5ecfd1adb442a86df5bd05bc6599e?itid=lk_inline_enhanced-template; U.S. Department of State, “2020 Country Reports on Human Rights Practices: United Arab Emirates,” <https://www.state.gov/wp-content/uploads/2021/10/UNITED-ARAB-EMIRATES-2020-HUMAN-RIGHTS-REPORT.pdf>.

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¹⁴ New York Times, “Consulting Firms Keep Lucrative Saudi Alliance, Shaping Crown Prince’s Vision,” Michael Forsythe, Mark Mazzetti, Ben Hubbard, and Walt Bogdanich, November 4, 2018,

These arrangements benefit foreign governments by providing them with soft power and influence in Washington. Many high-ranking former Generals, Admirals, and other servicemembers have boosted the interests of these foreign governments without disclosing their financial ties. According to the Project On Government Oversight, retired General Charles “Chuck” Wald, who worked as a consultant for both of your firms, Jones Group International and Ironhand Security, LLC,¹⁵ published op-eds in *Politico*, *The Hill*, and *The Wall Street Journal* advocating for support of Saudi Arabia without disclosing that relationship.¹⁶ One op-ed called for the U.S. to “articulate explicit military backing for Saudi Arabia and U.A.E.”¹⁷

The emoluments clause of the constitution requires retired military officers to receive congressional approval before accepting compensation from any foreign government.¹⁸ This is one of our country’s founding anti-corruption provisions to “limit foreign influence on federal officers.”¹⁹ Your firm has at least 8 retired officers who are subject to the emoluments clause, including retired Commander of U.S. Central Command Air Forces General Charles Wald, retired NATO Training Mission Commander Lieutenant General Michael Barbero, retired Major General Arnold Punaro, retired Brigadier General John Doucette, retired Lieutenant General Douglas Lute, retired Navy Rear Admiral Edward Cashman, retired Army Major General Sean Jenkins, and retired Navy Rear Admiral Cathal O’Connor.²⁰

This is not the first time I have raised concerns about lobbying and consulting firms with ties to repressive foreign countries. Following the Saudi regime’s ghastly assassination of journalist Jamal Khashoggi, I requested information from 23 firms that had lobbied for Saudi Arabia.²¹ I’ve also questioned Booz Allen Hamilton, Boston Consulting Group, and Deloitte about the services it has provided to the Kingdom of Saudi Arabia.²² Finally, I also sought information from McKinsey about its reported activities to support Saudi efforts to suppress the regime’s critics,

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¹⁹ Congressional Research Service, “The Emoluments Clause of the Constitution,” January 27, 2021, <https://crsreports.congress.gov/product/pdf/IF/IF11086>

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which may have led to one critic's arrest, the imprisonment of two family members of another critic, and shutting down the Twitter account of a third.²³

It is patently clear that more stringent rules are needed to protect the nation's national security from the pervasive influence-peddling of foreign governments. My *Anti-Corruption and Public Integrity Act* would end most foreign lobbying.²⁴ My *Department of Defense Ethics and Anti-Corruption Act* would also require former senior officials who had been employed in the White House, the Department of State; the Department of Defense, and the Department of the Treasury to receive approval from the Secretary of State before advising foreign governments.²⁵

The American people assume former government officials and retired military officers will not work against the national security interests of the United States. Your firms' affiliation with these regimes raises major questions about whether this assumption is incorrect and whether Jones Group International and Ironhand Security business activities are consistent with America's national security interests. In order to have a full and transparent accounting of your firm's ties to foreign government governments, I request answers to the following questions and requests for information no later than December 21, 2022:

1. Do Jones Group International and Ironhand Security currently have any business relationships with foreign governments or entities affiliated with foreign governments?
 - a. If so, which countries or entities affiliated with foreign governments are current Jones Group International and Ironhand Security clients?
 - b. For each of the last five years, please provide a list countries or entities affiliated with foreign governments that were Jones Group International and Ironhand Security clients
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3. Have any employees of Jones Group International or Ironhand Security received advisory opinions from federal government agencies on whether their work requires registration under the Foreign Agents Registration Act, an emoluments waiver, or is subject to International Traffic in Arms controls? Please provide those advisory opinions.
4. Please provide a list of each former U.S. servicemember that has worked for Jones Group International and Ironhand Security on behalf of foreign governments, including information on the foreign government they worked for, the time period in which they worked, and the amount they received in compensation for this work.


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²⁵ *Department of Defense Ethics and Public Integrity Act*, S. 2396, Section 201.

5. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time since 2017 to the present, for services that your firm provides directly to, or for the benefit of, foreign governments or any entities affiliated with foreign governments. These documents should include:
- a. the total compensation received for services rendered, and
 - b. specific issues on which the firm engaged in activities, including lobbying (as defined in Section 3 of the Lobbying Disclosure Act of 1995)²⁶ and public relations, including, to the maximum extent practicable, any specific rule, regulation, executive order, contract, or any other program, policy, or position.

Sincerely,



Elizabeth Warren
United States Senator



Sara Jacobs
Member of Congress

²⁶ 2 U.S.C. 1602(7)

Congress of the United States

Washington, DC 20515

December 7, 2022

William Cohen
Chairman and Chief Executive Officer
The Cohen Group
500 8th St NW, Suite 200
Washington, DC 20004

Dear Mr. Cohen:

I write to request information about the Cohen Group's work for and on behalf of foreign governments. A *Washington Post* investigation released last month revealed that since 2015, "more than 500 retired U.S. military personal – including scores of generals and admirals" have taken jobs with foreign governments – "mostly in countries known for human rights abuses and political repression."¹ This was an alarming finding, raising questions about whether these former U.S. military officials and the firms that hire them are working in the best interests of the United States government and its citizens, or in the interests of some of the world's worst regimes. Given these concerns, I ask that you provide information regarding the employees of your firm that have worked on behalf of foreign governments, particularly those with a history of repression and human rights abuses, and how your firm ensures its officials are not involved in illegal or inappropriate activities that harm U.S. national security interests.

The investigation by *The Washington Post* and the Project On Government Oversight found that between April 2010 and August 2020, "the State Department issued over 500 waivers to retiring servicemembers, allowing them to take emoluments to work on behalf of foreign interests."² The trend of American servicemembers taking "lucrative" roles with foreign governments has accelerated in over the past decade, as foreign governments work to leverage American expertise and "political clout."³

Alarming, many of the countries hiring former U.S. servicemembers have committed appalling human rights abuses.⁴ These relationships may undermine a key plank of U.S. foreign policy that places restrictions on assistance to foreign governments accused of human rights violations.⁵

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² Project on Government Oversight, "State Dept Is Quietly Approving Former Servicemembers' Work for Foreign Interests. That's a Problem." Julianne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template.

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⁴ *Id.*

⁵ Congressional Research Service, "Global Human Rights: Security Forces Vetting ("Leahy Laws")," Michael A. Weber, August 5, 2022, <https://www.crs.gov/Reports/IF10575>.

However, by funneling U.S. expertise through “consulting” firms that collect six- and seven-figure paychecks,⁶ foreign governments have been able to build up their military forces with U.S. assistance and without ongoing oversight from the U.S. government. Former Army colonel William Mooney, in his role at the small firm Fairfax National Security Solutions LLC, brought in a \$480,000 annual salary consulting for the governments of the United Arab Emirates and Saudi Arabia.⁷ Over the past seven years, 280 former U.S. servicemembers - included retired Marine Corps General and former Defense Secretary James Mattis,⁸ who is now a senior counselor at the Cohen Group⁹ - have sought authorization to work the United Arab Emirates, which has faced allegations of human rights abuses in Yemen and Libya.¹⁰ The *Post*’s investigation also revealed that you advised Saudi forces that have been part of coalition responsible for thousands of civilian casualties in the war in Yemen.¹¹

Additionally, since 2016, 15 retired U.S. generals and admirals have taken positions as paid consultants for the Defense Ministry of Saudi Arabia.¹² IronNet Cybersecurity, run by former National Security Agency Director Keith Alexander, worked with Saud al-Qahtani , a senior aide to crown prince Mohammed bin Salman, from July 2018 until 2020, despite Qatani’s involvement in the 2018 extrajudicial execution of journalist Jamal Khashoggi.¹³ Jones Group International and its subsidiary, Ironhand Security, led by former national security adviser and retired Marine General James Jones, expanded its partnership with the Saudi Defense ministry despite claims by General Jones that he was “disturbed” and “horrified” by Khashoggi’s death at the hands of the Saudi government.¹⁴ Major consulting firms, like Booz Allen Hamilton, hire

⁶ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

⁷ Washington Post, “UAE RELIED ON EXPERTISE OF RETIRED U.S. TROOPS TO BEEF UP ITS MILITARY,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>.

⁸ Washington Post, “UAE RELIED ON EXPERTISE OF RETIRED U.S. TROOPS TO BEEF UP ITS MILITARY,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>.

⁹ The Cohen Group, “James Mattis, Senior Counselor,” <https://cohengroup.net/who-we-are/team/james-mattis>.

¹⁰ Associated Press, “Inside Yemen’s secret prisons: ‘We could hear the screams,’” Maggie Michael, June 22, 2017, https://apnews.com/article/terrorism-counterterrorism-ap-top-news-al-qaida-international-news-b2a5ecfd1adb442a86df5bd05bc6599e?itid=lk_inline_enhanced-template; U.S. Department of State, “2020 Country Reports on Human Rights Practices: United Arab Emirates,” <https://www.state.gov/wp-content/uploads/2021/10/UNITED-ARAB-EMIRATES-2020-HUMAN-RIGHTS-REPORT.pdf>.

¹¹ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” by Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>; The New York Times, “U.S. Fails to Assess Civilian Deaths in Yemen War, Internal Report Says,” Edward Wong, June 7, 2022, <https://www.nytimes.com/2022/06/07/us/politics/saudi-yemen-war-us-weapons.html>.

¹² Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

¹³ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

¹⁴ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

“dozens of American veterans” to work in Saudi Arabia, advising both the Saudi army and the Saudi navy while the country maintained a blockade against Yemen that has, “threatened millions with starvation.”¹⁵

These arrangements benefit foreign governments by providing them with soft power and influence in Washington. Many high-ranking former generals, admirals, and other servicemembers have boosted the interests of these foreign governments without disclosing their financial ties. According to the Project on Government Oversight, retired General Charles “Chuck” Wald, who worked as a consultant for both Jones Group International and Ironhand Security, LLC,¹⁶ published op-eds in *Politico*, *The Hill*, and *The Wall Street Journal* advocating for support of Saudi Arabia without disclosing that relationship.¹⁷ One op-ed called for the U.S. to “articulate explicit military backing for Saudi Arabia and U.A.E.”¹⁸

The emoluments clause of the constitution requires retired military officers to receive congressional approval before accepting compensation from any foreign government.¹⁹ This is one of our country’s founding anti-corruption provisions to “limit foreign influence on federal officers.”²⁰ Your firm has several retired officers who are subject to the emoluments clause, including General Mattis, former supreme allied commander in Europe General Joseph Ralston, former Defense Security Cooperation Agency Director Lieutenant General Charles Hooper, former U.S. Central Command Commander, and former Coast Guard Commandant Admiral James Loy.²¹

This is not the first time I have raised concerns about lobbying and consulting firms with ties to repressive foreign countries. Following the Saudi regime’s ghastly assassination of Khashoggi, I requested information from 23 firms that had lobbied for Saudi Arabia.²² I’ve also questioned Booz Allen Hamilton, Boston Consulting Group, and Deloitte about the services it has provided to the Kingdom of Saudi Arabia.²³ Finally, I also sought information from McKinsey about its

¹⁵ New York Times, “Consulting Firms Keep Lucrative Saudi Alliance, Shaping Crown Prince’s Vision,” Michael Forsythe, Mark Mazzetti, Ben Hubbard, and Walt Bogdanich, November 4, 2018, <https://www.nytimes.com/2018/11/04/world/middleeast/mckinsey-bcg-booz-allen-saudi-khashoggi.html>.

¹⁶ Washington Post, “Retired U.S. Generals, Admirals Take Top Jobs with Saudi Crown Prince,” Craig Whitlock and Nate Jones, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/veterans-us-foreign-jobs-saudi-arabia/>.

¹⁷ Project on Government Oversight, “State Dept Is Quietly Approving Former Servicemembers’ Work for Foreign Interests. That’s a Problem.” Julienne McClure, October 18, 2022, https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem?itid=lk_interstitial_enhanced-template; Jewish Institute for National Security of America, General Charles “Chuck” Wald, USAF (ret.), <https://jinsa.org/person/general-charles-wald-usaf-ret-2/>.

¹⁸ The Hill, “A comprehensive strategy that secures real and lasting changes in Iran’s behavior,” Eric Edelman and Charles Wald, September 19, 2018, <https://thehill.com/blogs/congress-blog/foreign-policy/407392-a-comprehensive-strategy-that-secures-real-and-lasting/>.

¹⁹ U.S. Constitution, art. I, § 9, cl. 8.

²⁰ Congressional Research Service, “The Emoluments Clause of the Constitution,” January 27, 2021, <https://crsreports.congress.gov/product/pdf/IF/IF11086>.

²¹ The Cohen Group, “Who We Are,” <https://cohengroup.net/who-we-are/team-overview>.

²² Senator Elizabeth Warren, “Warren Seeks Answers from Lobbying Firms about Services for Saudi Government,” November 29, 2018, <https://www.warren.senate.gov/oversight/letters/warren-seeks-answers-from-lobbying-firms-about-services-for-saudi-government>.

²³ Senator Elizabeth Warren, “Warren Seeks Answers from Major Consulting Firms about Services for Saudi Government,” November 15, 2018, <https://www.warren.senate.gov/oversight/letters/warren-seeks-answers-from->

reported activities to support Saudi efforts to suppress the regime's critics, which may have led to one critic's arrest, the imprisonment of two family members of another critic, and shutting down the Twitter account of a third.²⁴

It is patently clear that more stringent rules are needed to protect the nation's national security from the pervasive influence-peddling of foreign governments. My *Anti-Corruption and Public Integrity Act* would end most foreign lobbying.²⁵ My *Department of Defense Ethics and Anti-Corruption Act* would also require former senior officials who had been employed in the White House, the Department of State; the Department of Defense, and the Department of the Treasury to receive approval from the Secretary of State before advising foreign governments.²⁶

The American people assume former government officials and retired military officers will not work against the national security interests of the United States. Your firm's affiliation with these regimes raises major questions about whether this assumption is incorrect and whether the Cohen Group's business activities are consistent with America's national security interests. In order to have a full and transparent accounting of your firm's ties to foreign government governments, I request answers to the following questions and requests for information no later than December 21, 2022:

1. Does the Cohen Group currently have any business relationships with foreign governments or entities affiliated with foreign governments?
 - a. If so, which countries or entities affiliated with foreign governments are current Cohen Group clients?
 - b. For each of the last five years, please provide a list countries or entities affiliated with foreign governments that were Cohen Group clients
2. For each entity listed in response to question #1, please provide a summary of the work done for these clients, and the total amount paid to the Cohen Group or individuals affiliated with the Cohen Group by these clients.
3. Have any members of the Cohen Group received advisory opinions from federal government agencies on whether their work requires registration under the Foreign Agents Registration Act, an emoluments waiver, or is subject to International Traffic in Arms controls? Please provide those advisory opinions.
4. Please provide a list of each former U.S. servicemember that has worked for the Cohen Group on behalf of foreign governments, including information on the foreign government they worked for, the time period in which they worked, and the amount they received in compensation for this work.

major-consulting-firms-about-services-for-saudi-government


²⁴ Letter from Senator Warren to Kevin Sneader at McKinsey, October 28, 2018, <https://www.warren.senate.gov/imo/media/doc/2018.10.23%20Letter%20to%20McKinsey%20re%20Saudi%20Arabia.pdf>; New York Times, "Saudis' Image Makers: A Troll Army and a Twitter Insider," Katie Benner, Mark Mazzetti, Ben Hubbard, and Mike Isaac, October 20, 2018, <https://www.nytimes.com/2018/10/20/us/politics/saudi-imagecampaign-twitter.html>.

²⁵ *Anti-Corruption and Public Integrity Act*, (115th Congress) S. 3357, Section 205.


²⁶ *Department of Defense Ethics and Public Integrity Act*, S. 2396, Section 201.

5. Please provide, in an electronically searchable format, full, unredacted copies of all contracts, under which your firm has received any compensation at any time since 2017 to the present, for services that your firm provides directly to, or for the benefit of, foreign governments or any entities affiliated with foreign governments. These documents should include:
- a. the total compensation received for services rendered, and
 - b. specific issues on which the firm engaged in activities, including lobbying (as defined in Section 3 of the Lobbying Disclosure Act of 1995)²⁷ and public relations, including, to the maximum extent practicable, any specific rule, regulation, executive order, contract, or any other program, policy, or position.

Sincerely,



Elizabeth Warren
United States Senator



Sara Jacobs
Member of Congress

²⁷ 2 U.S.C. 1602(7)